

Fill in this information to identify the case:

Debtor1 Thomas Brown

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the WESTERN District of Pennsylvania
(State)

Case number 19-22928-JCM

Form 4100R Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Athene Annuity and Life Company Court claim no. (if known): 7-1
Last 4 digits of any number you use to identify the debtor's account: 2967

Property address: 587 Thompson Run Road
Number Street
Pittsburgh, PA 15237
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- The next postpetition payment from the debtor(s) is due on: 10 /01 /2024
MM/DD/YYYY
- ☐ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.
- Creditor asserts that the total amount remaining unpaid as of the date of this response is:
- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____
- Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/ DD/ YYYY

*** Please note the Secured Creditor is in the process of filing a Transfer of Claim to reflect the creditor as the transferee of this claim. However, this Response to Notice of Final Cure is being filed to ensure the creditors compliance with Fed. R. Bankr. P. 3002.1

Debtor 1

Thomas Brown
 First Name Middle Name Last Name

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Case Number (if known)

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Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
☒ all amounts the creditor contends remain unpaid

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

☒ /s/ Michelle L. McGowan
 Signature

Date 9/16/2024

Print Michelle L. McGowan
 First Name Middle Name Last Name Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 13010 Morris Rd., Suite 450
 Number Street
 Alpharetta, GA 30004
 City State ZP Code

Contact 470-321-7112 Email mimcgowan@raslg.com

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
DISTRICT OF PITTSBURGH**

**IN RE: Thomas Brown,
Debtor.**

**CASE NO.: 19-22928-JCM
Chapter 13**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 17, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Thomas Brown
587 Thompson Run Rd.
Pittsburgh, PA 15237-3972

And via electronic mail to:

Brian C. Thompson
Thompson Law Group , PC
301 Smith Drive
Suite 6
Cranberry Township, PA 16066

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

By: /s/ Dena Eaves
Dena Eaves
deaves@raslg.com